



The Law Society of
Upper Canada | Barreau
du Haut-Canada

April 23, 2015

Sent by email to: poa-amp.feedback@ontario.ca

Office of the Treasurer

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Ministry of the Attorney General
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Re: *Administrative Monetary Penalty System for Provincial Offences*

Dear Sir/Madam:

We are pleased to respond to your request to participate in your consultation on the use of online Administrative Monetary Penalty System for infractions of provincial statutes and municipal bylaws in Ontario from the Ministry of the Attorney General (MAG).

As you are aware, the Law Society of Upper Canada is the regulator for Ontario's more than 47,000 lawyers and 7,000 paralegals. We carry out this mandate in the public interest and with a commitment to furthering the principles of equity and access to justice to foster a legal profession that reflects the public it serves.

We have a strong commitment to access to justice and working with MAG and justice partners across Ontario through TAG - The Action Group to promote greater access to justice. We acknowledge MAG's commitment to innovation and we support the effective use of resources and redeployment in the justice sector to support access to justice initiatives.

As the consultation document notes, "Determining the design elements of a delivery model, such as an online dispute resolution system, will require further consultation." In order for us to provide any meaningful appraisal of the proposal, further details are needed, including the choice of offences to be transferred, whether the penalty would in some circumstances include demerit points, the details of the dispute resolution

system including the opportunity to dispute, the design of the online process, and the qualifications and choice of hearing officers.

Access to justice issues require more information, including on any impact on individuals rights, public safety, and on the availability of any new system to the public including different language groups and those without access to electronic communications.

We thank you for the opportunity to participate. We look forward to further consultation as the matter progresses.

Yours truly,

A handwritten signature in black ink that reads "Janet E. Minor". The signature is written in a cursive style with a large initial 'J' and a distinct 'E'.

Janet E. Minor
Treasurer

copy: Patrick Monahan, Deputy Attorney General
Robert Lapper, Chief Executive Officer, Law Society of Upper Canada